



March 16, 2015

Mark Slovick
County of San Diego
Department of Planning & Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123

Re: Notice of Preparation for a Draft Environmental Impact Report
PDS2015-GPA-15-001, PDS2015-SP-15-001; PDS2015-REZ-15-001; PDS2015-TM-5597
Proposed construction of a new master planned community consisting of 2,135 dwelling units, 81,000 square feet of general commercial use, a six-acre charter school site, approximately 37 acres of parks and 1,202 acres of biological open space

Dear Mr. Slovick:

The City thanks you for the opportunity to respond to the Notice of Preparation (NOP) Draft Environmental Impact Report (DEIR) currently under preparation for the above referenced project. The City of San Marcos Development Services Department has following Notice of Preparation comments:

Traffic & Transportation

In terms of the scope of the DEIR traffic analysis scope discussed in the Initial Study, the City staff has a major concern about Option A for Deer Springs Road (DSR). Downgrading the classification of a DSR segment to a two-lane Community Collector is completely contrary to the cooperative efforts between the County, SANDAG and San Marcos to establish the Twin Oaks Valley Road (TOVR)/DSR corridor as a significant regional arterial roadway in the two local agency General Plans and SANDAG's 2050 Regional Transportation Plan. The TOVR/DSR corridor is a big part of SANDAG's designated regional arterial network, which is vital to an overall County highway mobility plan that does not rely exclusively on the Interstate and State Highway Systems. Further, the DSR/TOVR route was recently added to the National Highway System as part of the federal MAP-21 legislation. To have a relatively isolated, standalone land developer outside of any community plan area suggest that this arterial route, which directly connects SR-78 to I-15, be downgraded despite the multi-year transportation planning efforts at the Federal, State, regional and local government level, is not warranted. As such the City's position is that Option A should not be considered.

If the County should still decide to consider Option A in the environmental analysis, the trip distribution in the traffic impact analysis should be reviewed very carefully. The developers have suggested to City staff that downgrading that segment, specifically on TOVR, will have a "if you do not build it, they will not come" effect on minimizing traffic impacts in San Marcos. This is not realistic, since through traffic will still want to travel that route, and existing significant congestion will become intolerable with the new traffic from the development. There may be a temptation to reassign vehicle trips away from San Marcos towards I-15, because "they won't go that way if the road remains narrow", as the developers have characterized to City staff. That would not be an appropriate way to analyze the traffic per CEQA, especially in light of the major attractors for the project residents that are located in San Marcos, such as our large public parks, other recreational amenities, private schools, Palomar College, CSUSM, major shopping, restaurants and entertainment venues. An appropriate analysis will undoubtedly have a



significant impact on TOVR, as did the prior Merriam Mountains proposal that will require mitigation within the City. The City requests that the DEIR traffic analysis consider, at minimum, the following:

- 1- Trip distribution should be thoroughly reviewed and considered as to the real magnitude of DSR/TOVR usage by the project. Significant numbers of trips will pass through San Marcos.
- 2- Should the project impacts result in need to construct DSR from six to four lanes in the segment from I-15 to TOVR, then perhaps the appropriate City Transportation Impact Fees should be collected to fund a portion of costs of upgrading the existing under-improved segments of TOVR in San Marcos.
- 3- At a minimum, the traffic analysis should examine impacts to all TOVR intersections and segments to State Route 78. City staff foresees significant project impacts to some of these intersections and segments.
- 4- For this size project, alternative full access points for project access from the north of the site should be explored to the I-15, perhaps to Gopher Canyon Road via Lawrence Welk Drive.
- 5- If alternative access to the site cannot be achieved, the project should eliminate the Sarver Lane access, and rely on the access closest to the I-15 interchange, and the upper Twin Oaks Valley Road access.

Parks & Recreation

The Initial Study discusses that the project would develop approximately 37 acres of parks that would provide recreational opportunities to the residents of the proposed 2,135 dwelling units, and therefore, would not increase the use of existing neighborhood or regional parks. To avoid substantial physical deterioration of local park and recreational facilities, the project would dedicate land for local parks to the County pursuant to the Park Land Dedication Ordinance (PLDO). Based upon the County General Plan standards of 15 acres/1,000 population, the project should provide 89 acres of public parkland.

The Initial Study states that there are 21,765 acres of regional recreational facility parklands owned by the County, which exceeds the General Plan standard of 15 acres/1,000 population. In addition, there are over one million acres of publicly owned land in San Diego County dedicated to parks or open space including Federal lands, State Parks, special districts, and regional river parks. Due to the extensive acreage of existing publicly owned lands that can be used for recreation, the Initial Study states that the project would not result in substantial physical deterioration of regional recreational facilities or accelerate the deterioration of regional parkland. These regional recreational facilities will not provide for direct local parkland demands for the project area, including impact to the City of San Marcos public parklands.

Although there may be regional parklands, the City is concerned that the project would still fail to provide adequate parklands and active recreational facilities onsite, given that the public and private parklands proposed with the plan are 52 acres below the County standards, and lack highly demanded amenities such as athletic fields. There are only five athletic fields proposed in park P3 to serve the entire project area. The DEIR should address how the proposed public and private park amenities will serve the project area, and whether the amenities proposed will be sufficient to serve the approximately 5,900 future project residents. Of the utmost concern on the part of the City, is a lack of park amenities, in terms of type, amount, and proximity to project residents, within the plan area. This deficiency will result in an impact to the City's Walnut Grove Park, located less than a mile from the project site, as well as other City parks located within a couple miles of the project site. The DEIR should also include appropriate mitigation measures to address project impacts to City parks.



Fire Protection

The proposed Newland Sierra site plan and project information has been reviewed. Based on a review of the documents provided and a meeting with the County Fire Authority, the following comments are provided:

This project is located entirely within jurisdiction of Deer Springs Fire Protection District. An existing automatic aid agreement for emergency fire response and mutual aid agreement for medical response between Deer Springs Fire Department and San Marcos Fire Protection District will remain in place. Deer Springs Fire Department has provided a fire service commitment letter to the County of San Diego. The County Fire Authority has indicated this department has sufficient capacity to serve the project from their existing fire station location. It is our understanding that Capital improvements will be made to the Deer Springs fire station which is proposed to be rebuilt and increased in size. Currently, primary EMS response and transport services are provided through the Valley Center exclusive operation agreement (EOA) with primary ambulance response provided thru Mercy EMS. San Marcos Fire Protection District has an existing mutual aid agreement with Mercy EMS for ambulance response. The DEIR should demonstrate the provision of adequate equipment and staffing that will be provided to the project by Deer Springs Fire Protection District.

The project proposes three separate ingress and egress routes to serve the community and emergency access needs. The City of San Marcos has not had an opportunity to review any related traffic reports or studies. The DEIR should evaluate how access will be designed and how the project access points are anticipated to function. The City of San Marcos reserves the right to comment further on access design and function pending the City's review of traffic related reports and studies.

A comprehensive Fire Protection Plan (FPP) has been submitted to the County Fire Authority and Deer Springs Fire Protection District for review, and should be included in the DEIR. The FPP includes but is not limited to the following details: compliance with building construction, defensible space, emergency access and water supply. The FPP also details fuel load and flame height computer modeling, fire resistive landscaping and fire protection requirements. The review and final approval of the FPP and the Newland Sierra Project as a whole are the responsibility of the Deer Springs Fire Protection District.

Thank you in advance for your consideration of these comments. The City request that these comments are considered in the DEIR before it is circulated for public review. If you have any questions, please feel free to contact Susan Vandrew Rodriguez in the Planning Division at (760) 744-1050 extension 3237 to discuss our comments.

Cordially,

Jerry Backoff
Planning Division Director

cc: Michael D. Edwards, City Engineer
Buck Martin, Community Services Director
Robert Scott, Division Chief/Fire Marshal